

PATENT**Application # 10/563,187****Attorney Docket # 1043-005**

Moreover, the present Office Action presents **no proof, and indeed no evidence, of anything** “in the prior art as a whole to suggest the **desirability**, and thus the obviousness, of making the **combination**.”

The present Office Action fails to provide any suggestion or motivation to combine the applied portions of the relied upon references to arrive at the claimed subject matter of claim 24.

Thus, the Office Action fails to present the required **proof** of obviousness.

d. Conclusion

For at least these reasons, Applicant respectfully requests withdrawal of the rejection of claim 24.

25. Claim 25**a. *Prima Facie* Criteria**

None of the applied portions of the references relied upon in the Office Action, whether considered alone or in combination, establish a *prima facie* case of obviousness. Since claim 25 depends from claim 15, Applicant respectfully incorporates by reference herein each argument presented traversing the rejection of claim 15.

b. No Motivation or Suggestion to Combine the Applied References

The present Office Action presents **no proof, and notably no evidence** whatsoever, of any “suggestion, motivation, or teaching in the prior art that would have led a person of ordinary skill in the art to”:

1. “select the references”;
2. “select the teachings of [the] separate references”; or
3. “combine [those teachings] in the way that would produce the claimed” subject matter.

Moreover, the present Office Action presents **no proof, and indeed no evidence, of anything** “in the prior art as a whole to suggest the **desirability**, and thus the obviousness, of making the **combination**.”

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The present Office Action fails to provide any suggestion or motivation to combine the applied portions of the relied upon references to arrive at the claimed subject matter of claim 25.

Thus, the Office Action fails to present the required **proof** of obviousness.

c. Conclusion

For at least these reasons, Applicant respectfully requests withdrawal of the rejection of claim 25.

26. Claim 26

a. *Prima Facie* Criteria

None of the applied portions of the references relied upon in the Office Action, whether considered alone or in combination, establish a *prima facie* case of obviousness. Since claim 26 depends from claim 15, Applicant respectfully incorporates by reference herein each argument presented traversing the rejection of claim 15.

b. No Motivation or Suggestion to Combine the Applied References

The present Office Action presents **no proof, and notably no evidence** whatsoever, of any "suggestion, motivation, or teaching in the prior art that would have led a person of ordinary skill in the art to":

1. "select the references";
2. "select the teachings of [the] separate references"; or
3. "combine [those teachings] in the way that would produce the claimed" subject matter.

Moreover, the present Office Action presents **no proof, and indeed no evidence, of anything** "in the prior art as a whole to suggest the **desirability**, and thus the obviousness, of making the **combination**."

The present Office Action fails to provide any suggestion or motivation to combine the applied portions of the relied upon references to arrive at the claimed subject matter of claim 26.

Thus, the Office Action fails to present the required **proof** of obviousness.

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OCT 24 2006

Application # 10/563,187

Attorney Docket # 1043-005

c. Conclusion

For at least these reasons, Applicant respectfully requests withdrawal of the rejection of claim 26.

27. Claim 27**a. *Prima Facie* Criteria**

None of the applied portions of the references relied upon in the Office Action, whether considered alone or in combination, establish a *prima facie* case of obviousness. Since claim 27 depends from claim 15, Applicant respectfully incorporates by reference herein each argument presented traversing the rejection of claim 15.

b. No Motivation or Suggestion to Combine the Applied References

The present Office Action presents **no proof, and notably no evidence** whatsoever, of any "suggestion, motivation, or teaching in the prior art that would have led a person of ordinary skill in the art to":

1. "select the references";
2. "select the teachings of [the] separate references"; or
3. "combine [those teachings] in the way that would produce the claimed" subject matter.

Moreover, the present Office Action presents **no proof, and indeed no evidence, of anything** "in the prior art as a whole to suggest the **desirability**, and thus the obviousness, of making the **combination**."

The present Office Action fails to provide any suggestion or motivation to combine the applied portions of the relied upon references to arrive at the claimed subject matter of claim 27.

Thus, the Office Action fails to present the required **proof** of obviousness.

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PATENT

Application # 10/563,187

OCT 24 2006

Attorney Docket # 1043-005

c. Conclusion

For at least these reasons, Applicant respectfully requests withdrawal of the rejection of claim 27.

28. Claim 28**a. *Prima Facie* Criteria**

None of the applied portions of the references relied upon in the Office Action, whether considered alone or in combination, establish a *prima facie* case of obviousness. Since claim 28 depends from claim 15, Applicant respectfully incorporates by reference herein each argument presented traversing the rejection of claim 15.

b. No Motivation or Suggestion to Combine the Applied References

The present Office Action presents **no proof, and notably no evidence whatsoever**, of any "suggestion, motivation, or teaching in the prior art that would have led a person of ordinary skill in the art to":

1. "select the references";
2. "select the teachings of [the] separate references"; or
3. "combine [those teachings] in the way that would produce the claimed" subject matter.

Moreover, the present Office Action presents **no proof, and indeed no evidence, of anything** "in the prior art as a whole to suggest the **desirability**, and thus the obviousness, of making the **combination**."

The present Office Action fails to provide any suggestion or motivation to combine the applied portions of the relied upon references to arrive at the claimed subject matter of claim 28.

Thus, the Office Action fails to present the required **proof** of obviousness.

c. Conclusion

For at least these reasons, Applicant respectfully requests withdrawal of the rejection of claim 28.

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OCT 24 2006

PATENT

Application # 10/563,187

Attorney Docket # 1043-005

29. Claim 29**a. *Prima Facie* Criteria**

None of the applied portions of the references relied upon in the Office Action, whether considered alone or in combination, establish a *prima facie* case of obviousness. Since claim 29 depends from claim 15, Applicant respectfully incorporates by reference herein each argument presented traversing the rejection of claim 15.

b. No Motivation or Suggestion to Combine the Applied References

The present Office Action presents **no proof, and notably no evidence** whatsoever, of any "suggestion, motivation, or teaching in the prior art that would have led a person of ordinary skill in the art to":

1. "select the references";
2. "select the teachings of [the] separate references"; or
3. "combine [those teachings] in the way that would produce the claimed" subject matter.

Moreover, the present Office Action presents **no proof, and indeed no evidence, of anything** "in the prior art as a whole to suggest the **desirability**, and thus the obviousness, of making the combination."

The present Office Action fails to provide any suggestion or motivation to combine the applied portions of the relied upon references to arrive at the claimed subject matter of claim 29.

Thus, the Office Action fails to present the required **proof** of obviousness.

c. Conclusion

For at least these reasons, Applicant respectfully requests withdrawal of the rejection of claim 29.

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OCT 24 2006

PATENT

Application # 10/563,187

Attorney Docket # 1043-005

30. Claim 30**a. *Prima Facie* Criteria**

None of the applied portions of the references relied upon in the Office Action, whether considered alone or in combination, establish a *prima facie* case of obviousness. Since claim 30 depends from claim 15, Applicant respectfully incorporates by reference herein each argument presented traversing the rejection of claim 15.

b. No Motivation or Suggestion to Combine the Applied References

The present Office Action presents **no proof, and notably no evidence whatsoever**, of any "suggestion, motivation, or teaching in the prior art that would have led a person of ordinary skill in the art to":

1. "select the references";
2. "select the teachings of [the] separate references"; or
3. "combine [those teachings] in the way that would produce the claimed" subject matter.

Moreover, the present Office Action presents **no proof, and indeed no evidence, of anything** "in the prior art as a whole to suggest the **desirability**, and thus the obviousness, of making the **combination**."

The present Office Action fails to provide any suggestion or motivation to combine the applied portions of the relied upon references to arrive at the claimed subject matter of claim 30.

Thus, the Office Action fails to present the required **proof** of obviousness.

c. Conclusion

For at least these reasons, Applicant respectfully requests withdrawal of the rejection of claim 30.

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OCT 24 2006

Application # 10/563,187

Attorney Docket # 1043-005

31. Claim 31**a. *Prima Facie* Criteria**

None of the applied portions of the references relied upon in the Office Action, whether considered alone or in combination, establish a *prima facie* case of obviousness. Since claim 31 depends from claim 15, Applicant respectfully incorporates by reference herein each argument presented traversing the rejection of claim 15.

b. No Motivation or Suggestion to Combine the Applied References

The present Office Action presents **no proof, and notably no evidence** whatsoever, of any "suggestion, motivation, or teaching in the prior art that would have led a person of ordinary skill in the art to":

1. "select the references";
2. "select the teachings of [the] separate references"; or
3. "combine [those teachings] in the way that would produce the claimed" subject matter.

Moreover, the present Office Action presents **no proof, and indeed no evidence, of anything** "in the prior art as a whole to suggest the **desirability**, and thus the obviousness, of making the **combination**."

The present Office Action fails to provide any suggestion or motivation to combine the applied portions of the relied upon references to arrive at the claimed subject matter of claim 31.

Thus, the Office Action fails to present the required **proof** of obviousness.

c. Conclusion

For at least these reasons, Applicant respectfully requests withdrawal of the rejection of claim 31.

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OCT 24 2006

Application # 10/563,187

Attorney Docket # 1043-005

32. Claim 32**a. *Prima Facie* Criteria**

None of the applied portions of the references relied upon in the Office Action, whether considered alone or in combination, establish a *prima facie* case of obviousness. Since claim 32 depends from claim 15, Applicant respectfully incorporates by reference herein each argument presented traversing the rejection of claim 15.

b. No Motivation or Suggestion to Combine the Applied References

The present Office Action presents **no proof, and notably no evidence** whatsoever, of any "suggestion, motivation, or teaching in the prior art that would have led a person of ordinary skill in the art to":

1. "select the references";
2. "select the teachings of [the] separate references"; or
3. "combine [those teachings] in the way that would produce the claimed" subject matter.

Moreover, the present Office Action presents **no proof, and indeed no evidence, of anything** "in the prior art as a whole to suggest the **desirability**, and thus the obviousness, of making the **combination**."

The present Office Action fails to provide any suggestion or motivation to combine the applied portions of the relied upon references to arrive at the claimed subject matter of claim 32.

Thus, the Office Action fails to present the required **proof** of obviousness.

c. Conclusion

For at least these reasons, Applicant respectfully requests withdrawal of the rejection of claim 32.

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OCT 24 2006

Application # 10/563,187

Attorney Docket # 1043-005

33. Claim 33**a. *Prima Facie* Criteria**

None of the applied portions of the references relied upon in the Office Action, whether considered alone or in combination, establish a *prima facie* case of obviousness. Since claim 33 depends from claim 15, Applicant respectfully incorporates by reference herein each argument presented traversing the rejection of claim 15.

b. No Motivation or Suggestion to Combine the Applied References

The present Office Action presents **no proof, and notably no evidence** whatsoever, of any "suggestion, motivation, or teaching in the prior art that would have led a person of ordinary skill in the art to":

1. "select the references";
2. "select the teachings of [the] separate references"; or
3. "combine [those teachings] in the way that would produce the claimed" subject matter.

Moreover, the present Office Action presents **no proof, and indeed no evidence, of anything** "in the prior art as a whole to suggest the **desirability**, and thus the obviousness, of making the **combination**."

The present Office Action fails to provide any suggestion or motivation to combine the applied portions of the relied upon references to arrive at the claimed subject matter of claim 33.

Thus, the Office Action fails to present the required **proof** of obviousness.

c. Conclusion

For at least these reasons, Applicant respectfully requests withdrawal of the rejection of claim 33.

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Application # 10/563,187

Attorney Docket # 1043-005

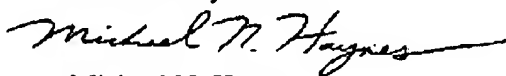
CONCLUSION

It is respectfully submitted that, in view of the foregoing amendments and remarks, the application as amended is in clear condition for allowance. Reconsideration, withdrawal of all grounds of rejection, and issuance of a Notice of Allowance are earnestly solicited.

The Office is hereby authorized to charge any additional fees or credit any overpayments under 37 C.F.R. 1.16 or 1.17 to Deposit Account No. 50-2504. The Examiner is invited to contact the undersigned at 434-972-9988 to discuss any matter regarding this application.

Respectfully submitted,

Michael Haynes PLC



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Date: 24 October 2006

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